PETER DOUGHERTY

April 4, 2025

United States Federal Communications Commission
45 L Street NE
Washington, DC 20554

RE: DELETE, DELETE, DELETE

With reference to GN Docket No. 25-133, issued on March 12, 2025.

This document addresses regulations under CFR 47 Part 95 Subpart E, the General Mobile Radio Service. The proposal includes eliminating or modifying certain sections of the regulations for reasons outlined below.

§ 95.1705: A valid *individual* license is required to operate a GMRS station.

The GMRS licensing requirement itself should be considered a burden due to the widespread availability of inexpensive imported Part 95E equipment sold at numerous outdoor and recreation equipment shops. Most users are not even aware of licensing requirements and the transmission of callsigns is virtually non-existent outside of certain GMRS repeater clubs. Just get rid of the licensing requirement outright, or for equipment that operates at power levels under 10 Watts.

If it is not deemed in the public interest to eliminate licensing altogether, there is a strong use case for off-road park facilities owned by private individuals or small businesses. These facilities offer paid memberships allowing drivers of Jeeps or other off-road vehicles to use their private land.

GMRS has become a common method of communication among users of such facilities nationwide. However, under current Part 95E regulations, park employees are not legally authorized to communicate with drivers unless each employee holds an individual license. Therefore, it may be beneficial to waive the no-business requirement in these circumstances or amend regulations to allow small businesses to use GMRS for direct communication with the public during their business operations. Additionally, since these parks are often located outside areas served by cellular networks, this addresses a safety concern.

§ 95.1705 subsection (a)(3): Coded messages or messages with hidden meanings

GMRS is used by neighborhood watch groups, families, and community groups for security and emergency coordination. Messages often contain sensitive information, such as locations of children or supplies, requiring encryption. Similarly, patient details relayed during emergencies need to be protected. The public does not need access to personal information broadcasted on GMRS. Encrypted communications are essential for privacy during disasters and should be allowed.

§ 95.1749: Operation of a GMRS station with a telephone connection is prohibited

Along with 95.349. GMRS repeater linking is a potential life saving and security issue in sparsely-settled areas of the country. This section needs to be deleted outright as it serves no effective purpose in 2025.

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§ 95.1771: GMRS Emission Types

Spectrally-efficient digital audio modes such as DMR are currently banned under current regulations, and need to be permitted. Furthermore, should 95.1705 be repealed to allow encryption, digital modes such as DMR and APCO-25 would be necessary to allow such transmission.

I strongly support many of the current strict technical requirements for Part 95E equipment, however I believe this should be loosened to allow equipment operating under Part 90 to be programmed for operation in Part 95E, which, in practice, happens all the time anyway. These radios are built to even more stringent technical standards than current GMRS equipment.

Perhaps most controversially, I believe that the current General Mobile Radio Service frequency pool be expanded to include VHF MURS (Part 95J), and certain “DOT” and “STAR” Part 90 frequencies commonly used for itinerant mobile operation by small businesses. I would also roll in the current FRS frequencies to GMRS. At large public events it is virtually impossible to find open channels for operations.

Respectfully submitted,

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